### **EXHIBIT B**

### PROCEDURES AND REQUIREMENTS

# **Household Hazardous Waste Grant 17<sup>th</sup> Cycle**

### FY 2008/09

Copies of these Procedures and Requirements should be shared with BOTH the Finance Department AND the staff responsible for implementing the grant activities.

#### Introduction

The Household Hazardous Waste (HHW) Grant Program is administered through the California Integrated Waste Management Board (CIWMB). These Procedures and Requirements describe project and reporting requirements, report due dates, report contents, grant payment conditions, eligible and ineligible project costs, project completion and closeout procedures, records and audit requirements.

This document is incorporated by reference, and attached to, the Grant Agreement.

All documents submitted must be printed double-sided on one hundred percent (100%) recycled-content paper. Specific pages containing full-color photographs or other ink-intensive graphics may be printed on photographic paper.

#### Milestones

October 2008 (tentative date) Grant Term Begins pending the Notice to Proceed

January 31, 2010 **Progress Report Due** (Covering activities during

2008 to January 31, 2010

April 15, 2011 Final Report Due (summary of activity from Notice

to Proceed to April 15, 2011)

April 15, 2011 Final Payment Request Due

April 30, 2011 Grant Term Ends

No extensions will be granted for submittal of Final Report and Final Payment Request. Failure to submit the final report and final Payment Request with appropriate documentation by April 15, 2011 may result in rejection of the Payment Request and/or forfeiture by the Grantee of claims for costs incurred that might otherwise have been eligible for grant funding.

### **Questions?**

All communication regarding this grant should be directed to Elaine Novak at (916) 341-6380 or <a href="mailto:enovak@ciwmb.ca.gov">enovak@ciwmb.ca.gov</a>. To find the email address and telephone number of your Grant Manager or other HHW staff, refer to:

http://www.calepa.ca.gov/StaffDirectory/default.asp?bdo=3. The Grantee may also contact the Financial Assistance Division, Grant and Loan Resources Branch at (916) 341-6457.

### Prior to Commencing Work

Prior to commencing work under this Grant, the Grantee's Grant Manager or primary contact and authorized grant Signature Authority should review the Grant Self Assessment Checklist Form so as to identify key administrative requirements. Evaluation of the Grantee's compliance with these requirements is a major part of all grant audit reviews.

As set forth more fully in the "Self Assessment Checklist" section of the Terms and Conditions (Exhibit A), the Grantee shall submit a completed and signed Form with the Final Report.

To obtain the Grant Self Assessment Checklist Form (CIWMB 641) see <a href="http://www.ciwmb.ca.gov/Reuse/Grants/Forms.htm">http://www.ciwmb.ca.gov/Reuse/Grants/Forms.htm</a> or contact the CIWMB Grant Manager.

#### **Reliable Contractor Declaration**

Prior to authorizing a contractor(s) to commence work under this Grant, the Grantee shall submit to the CIWMB Grant Manager a declaration from the contractor(s), signed under penalty of perjury, stating that within the preceding three (3) years, none of the events listed in Section 17050 of Title 14, California Code of Regulations, Natural Resources, Division 7, has occurred with respect to the contractor(s) and the subcontractor(s), respectively. See

http://www.ciwmb.ca.gov/Regulations/Title14/ch1.htm#ch1a5

If a (sub) contractor is placed on the CIWMB Unreliable List after award of this Grant, the Grantee may be required to terminate that contract.

To obtain the Reliable Contractor Declaration form (CIWMB 168) see <a href="http://www.ciwmb.ca.gov/Reuse/Grants/Forms.htm">http://www.ciwmb.ca.gov/Reuse/Grants/Forms.htm</a>

# Where to send Reports, Payment Requests, etc.

Send all Reports, Payment Requests and written correspondence to the CIWMB Grant Manager's attention at:

California Integrated Waste Management Board

HHW Grant Program

Financial Assistance Division, MS 9

P.O. Box 4025, 1001 "I" Street Sacramento, CA 95812-4025

Attn: (CIWMB Grant Manager's Name)

### **Eligible Costs**

All expenditures must be only for activities, products, and costs included in the approved Work Plan (Exhibit C) and approved Budget (Exhibit D), and must be incurred, services provided and goods received after receiving a Notice to Proceed and before the end of the Grant Term (i.e., Grant Performance Period). Costs, including materials, supplies, equipment and facilities must be related to the management of HHW, be reasonable and focused on local needs as described in the application. Any proposed revision(s) to the Work Plan and/or Budget must be submitted and pre-approved in writing by the CIWMB Grant Manager prior to

# Eligible Costs (cont.)

Grantee incurring the proposed expenditures. The approval document should be retained by the Grantee for audit purposes. See Audit Record/Access section of the Terms and Conditions (Exhibit A).

Costs, including materials, supplies, equipment and facilities must be related to the management of HHW.

Eligible costs include, but are not limited to, the following:

- Construction of Permanent Household Hazardous Waste Collection Facilities (PHHWCF) including construction-expansion, equipment and service;
- Design of Permanent Household Hazardous Waste Collection Facilities (PHHWCF) including facility planning, site analysis, conceptual design and the local approval process;
- Expenses that provide an opportunity for the collection of HHW that would not otherwise exist, e.g. private/public partnerships;
- Grantee overhead or indirect costs up to ten percent (10%) of the grant funds reimbursed if supported by a Cost Allocation Plan. For more detail on overhead/indirect costs, see discussion under Overhead/Indirect Costs on Page 5.
- Publicity and educational activities, particularly those that utilize communitybased social marketing, that support HHW take-back and Extended Producer Responsibility (EPR), recycling, and use of recycled products, and/or pollution prevention programs;
- Set-up and operation of temporary facilities for one-day or multi-day collection events;
- Sharps containers that provide disposal instructions. The containers must be collected at an established HHW collection facility in order for grant funds to cover transportation and disposal costs. The cost of this portion of a program is not to exceed \$40,000.

#### **Ineligible Costs**

Any costs not included in the approved budget and not directly related to the approved grant project are ineligible for reimbursement. If there are questions regarding ineligible costs, contact the CIWMB Grant Manager. Ineligible costs include, but are not limited to:

- Cell phones, pagers, cameras, Personal Digital Assistants, handheld computers, personal computers, and other similar personal electronic devices
- Costs (claimed as either grant expenses or matching monies) incurred prior to the Notice to Proceed or after the end of the grant term
- Costs currently covered by or incurred under another CIWMB loan, grant or contract
- Costs deemed unreasonable or not related to the grant project by the CIWMB Grant Manager
- Costs related to the management of pharmaceutical wastes
- Costs that are not consistent with local, state, and federal guidelines and regulations
- Costs to maintain an existing HHW program

# Ineligible Costs (cont.)

- Developing a permanent facility on non-government owned or managed property unless the applicant has established a long-standing working relationship with the company or private landowner. Proof of long-term continued commitment to sponsor or co-sponsor the facility with the jurisdiction(s) is required consistent with the purposes for which the CIWMB approved the application
- Development or customizing of school curricula
- Enforcement activities
- Expenses for audits of the Grantee's entire organization, or portions thereof
- Fines or penalties due to violation of federal, state or local laws, ordinances, or regulations
- Food or beverages (e.g. as part of meetings, workshops, training, or events)
- Hazardous Waste Operations and Emergency Response Standards (HAZWOPER) 40-hour and 24-hour courses
- Leasing or purchase of petroleum-fueled vehicles (including hybrid vehicles) by non-governmental agencies unless pre-approved in writing by the CIWMB Grant Manager
- Management, handling, disposal, or treatment of radioactive explosive or medical wastes or extremely hazardous waste
- Movie theater screen advertising
- Out-of-state travel
- Overhead/indirect costs in excess of the allowable percentage (10% of grant funds reimbursed) as defined under Eligible Costs above or not supported by a Cost Allocation plan (See <u>Overhead/Indirect Costs</u> below)
- Overtime costs/Compensated Time Off (except for local government staffing during specially scheduled evening or weekend events that are pre-approved in writing by the CIWMB Grant Manager when law or labor contract requires overtime compensation)
- Personnel costs incurred while an employee assigned to the project funded by the grant does not work on the project (e.g. use of accrued time such as sick leave, vacations, etc.)
- Premiums or promotional items that contribute to the solid or hazardous waste stream
- Pre-paid expenditures for future goods or services delivered beyond the end of the grant term. (Exemption: The CIWMB Grant Manager may consider approving products purchased in full before the end of the Grant Term but delivered after the Grant Term if the delay is caused solely by the supplier, and not by the Grantee. The Grantee must request an exemption in writing and receive the written pre-approval from the Grant Manager)
- Profit or mark-up by the Grantee
- Promotional items or premiums that exceed \$6 per item if written preapproval was not obtained
- Promotional items or premiums that are not related to the grant or the target audience
- Promotion of brand-name product(s) or private businesses with grant funds
- Public education costs not directly tied to HHW collection

# Ineligible Costs (cont.)

- Purchase or lease of land or buildings
- Relocation expenses unless pre-approved in writing by Grant Manager
- Remediation (any cleanup or restoration of polluted areas)
- Revisions of the County Integrated Waste Management Plan or its elements
- Travel costs exceeding the state-approved rates for mileage, per diem, lodging, etc.

### Overhead/Indirect Costs

### **Overhead/Indirect costs**

Overhead and indirect costs can be claimed by Grantees. The following guidelines must be used when claiming these costs:

• The total cost of overhead and indirect cost charged to the grant shall not exceed ten percent (10%) of the grant funds reimbursed. These costs are expenditures not capable of being assigned or not readily itemized to a particular project or activity, but considered necessary for the operation of the organization and the performance of the program. The costs of operating and maintaining facilities, accounting services, and administrative salaries are examples of overhead and indirect costs. All overhead and indirect costs charged to the grant must be associated with grant activities as shown in the approved Budget.

If you are uncertain whether a given cost is considered an overhead/indirect cost by the CIWMB, contact the CIWMB Grant Manager.

- Direct costs charged directly to the grant shall not be included in the overhead/indirect cost formula.
- Supervision performed by Managers and Supervisors can be included in the overhead/indirect cost formula, and therefore, will not be a direct charge to the grant. On the other hand, if a Manager or Supervisor performs an activity that is directly related to the execution of the grant (not supervision), costs associated with this activity may be included as a direct charge. Such activity must be clearly supported by appropriate documentation and shall not be charged to the grant as overhead or indirect cost.
- The Grantees must have on file an internally approved Cost Allocation Plan which specifically documents how the cost amount was established and how it is supported by formal accounting records to substantiate the charges. The Cost Allocation Plan must be approved by an appropriate Supervisor/Manager in your agency. The Cost Allocation Plan must identify program elements included in the overhead/indirect cost calculation. See the sample "Cost Allocation Plan" calculation below:

Total department indirect cost divided by total department direct cost base equals indirect cost rate.

# Overhead/Indirect Costs (cont.)

The Grantee must maintain organized and accurate records that follow generally accepted accounting principles and leave an audit trail. The Grantee must provide access to all documents related to the grant program and fiscal operation of the grant program as deemed necessary by the CIWMB.

# Large Equipment CIWMB Acknowledgement

A CIWMB sticker (bumper sticker size) that displays the statement: "Funded by a grant from the California Integrated Waste Management Board" is required to be affixed to all large pieces of equipment purchased with grant funds. When submitting the Final Report, the photograph of this equipment should include the affixed sticker. CIWMB stickers are available at no cost by contacting the CIWMB Grant Manager.

# **Recycled Content Requirements**

All products containing recycled-content material that are purchased with grant funds must be reported. At a minimum, Grantees must report the percentage of recycled-content material for products purchased in the product categories listed below. Grantees must use a separate Recycled-Content Product Certification (RCP) Form (CIWMB 74G) for each supplier and submit these forms with the Final Progress Report. The form may be found at the CIWMB website at: http://www.ciwmb.ca.gov/HHW/Forms.

Purchases of the following products with grant funds must meet the specific percentages of recycled-content as described on the RCP form:

Paper ProductsPrinting & Writing PaperPlastic ProductsCompost & Co-CompostGlass ProductsLubricating OilsPaintSolventsSteel Products

**Tire-Derived Products** 

Any exceptions to the above requirements must be pre-approved in writing by the CIWMB Grant Manager.

Recycled-content information for some commonly purchased Grant items may be found at:

http://www.ciwmb.ca.gov/UsedOil/Grants/Resources/Vendors/PromoProduct.doc

More information regarding RCP vendors and contractors may be found at: <a href="http://www.ciwmb.ca.gov/RCP/">http://www.ciwmb.ca.gov/RCP/</a>.

For information about the CIWMB *Buy Recycled Program*, visit: <a href="http://www.ciwmb.ca.gov/BuyRecycled/">http://www.ciwmb.ca.gov/BuyRecycled/</a>

Materials or items purchased for publicity or educational purposes may be denied for reimbursement if they do not meet the requirements detailed in this section.

All items/materials, radio, televisions, etc., public service announcements or advertisements, as appropriate, must meet the recycled-content product content

# Recycled Content Requirements (cont.)

requirements as set forth in the Terms and Conditions and described in the RCP form, and must include the following:

- 1) Acknowledgement of the CIWMB funding and the Board's slogan that reads "Funded by a Grant from the California Integrated Waste Management Board." Use of the initials "CIWMB" within the Acknowledgement is not sufficient. Exception: The acknowledgement line is not required on small items where space constraints would not allow for this line or if it would interfere with the message (pencils, small magnets, etc.). All exceptions must be pre-approved in writing by the CIWMB Grant Manager.
- 2) The CIWMB logo as reflected on the CIWMB website <a href="http://www.ciwmb.ca.gov/gallery/CIWMBLogos/">http://www.ciwmb.ca.gov/gallery/CIWMBLogos/</a>. Questions concerning the current CIWMB logo should be directed to the Grant Manager.
- 3) Specific information on HHW recycling/disposal rates.
- 4) A list of HHW collection locations or a 24-hour hotline number. When locations are listed, include the following language: "Call for hours of operation and types of material accepted."

# Copyright Requirements

The following language must appear on any copyrightable material produced with Board funds:

Copyright language: © {year of creation} by the California Integrated Waste Management Board (CIWMB). All rights reserved. This publication, or parts thereof, may not be reproduced without permission from CIWMB.

Examples of copyrightable material include, but are not limited to:

- CDs and DVDs of audio and/or visual material
- Computer Software
- Brochures, pamphlets, and reproductions of advertisements designed for distribution

Please check with the CIWMB Grant Manager with specific questions about the applicability of using copyright language.

### **Graphics**

HHW-related graphics are available on the CIWMB website at: <a href="http://www.ciwmb.ca.gov/UsedOil/graphics/HHWArt/">http://www.ciwmb.ca.gov/UsedOil/graphics/HHWArt/</a>



For information on recycled-content products, see: http://www.ciwmb.ca.gov/BuyRecycled/StateAgency

<sup>&</sup>lt;sup>1</sup> There are two acceptable Spanish translations: "Financiado por una beca del California Integrated Waste Management Board" or "Patrocinado por fondos del California Integrated Waste Management Board." For other languages, Grantee must work with a certified translator or person fluent in reading and writing that language.

Written Pre-Approval Required for Select Publicity and Education Materials

Publicity & Education Reporting Samples

Progress Report Due Date: January 31, 2010 The following materials and items require written approval from the CIWMB Grant Manager prior to incurring the expense. These items include:

- 1. Premiums, if the per item cost exceeds six dollars (\$6.00)
- 2. All television, radio and video scripts.

For audit purposes, Grantees are required to retain samples of all P&E materials for three years AFTER the close of the Grant Term, or a longer period if warranted to resolve any issues with this grant. (See Audit/Records Access Section in Terms and Conditions, Exhibit A.)

The Grantee must submit a **Progress Report** which covers activities from receipt of the **Notice to Proceed** through **January 31, 2010.** Failure to file the Progress Report in compliance with the requirements set forth below by the established deadlines may be considered a breach of this Grant Agreement and may result in administrative action up to and including termination of this Grant Agreement.

The reports should include the following:

1. The Grant Number, Grantee's name, and reporting period.

The following disclaimer must appear on the cover page of the report:

"The statements and conclusions of this report are those of the Grantee and not necessarily those of the California Integrated Waste Management Board, its employees, or the State of California. The State makes no warranty, express or implied, and assumes no liability for the information contained in the succeeding text."

- 2. A description of work completed and arranged according to tasks and Expenditure Categories as shown in the Work Plan. Responses to the following questions should be included as applicable:
  - a) What are the unique or new activities/technologies?
  - b) What were the successes (so far) in relation to goals and objectives?
  - c) What problems/challenges were discovered during implementation?
  - d) How were the problems/challenges resolved?
  - e) What "best practices" might be shared with other jurisdictions?
- 3. A brief discussion of work to be conducted during the remainder of the grant term. If necessary, discuss any adjustments to the Work Plan resulting from the evaluation process.
- 4. Payment Request, Supporting Documentation and Expenditure Itemization Summary (EIS) may be submitted if reimbursement is desired. Please refer to the section labeled "Payment Requests" for more details.

Progress Report Due Date: January 31, 2010 (cont.)

Final Progress Report Due Date: April 15, 2011 5. Whenever Permit by Rule (PBR) is required by law, copies of the PBR Notification Form (Department of Toxic Substance Control – DTSC Form 1171, 1094b) for all facility construction/expansion, temporary/mobile collection events, door-to-door collection events, etc. For additional information regarding permits, including PBR, see <a href="http://www.calepa.ca.gov/CUPA/Directory/default.aspx">http://www.calepa.ca.gov/CUPA/Directory/default.aspx</a>

The Final Progress Report covers activities from November 2008 (anticipated date of your Notice to Proceed) through April 15, 2011. This report summarizes the entire grant activities and should include:

- 1. The Grant Number, Grantee's name and Grant Term
- 2. The following disclaimer statement on the cover page:

"The statements and conclusions of this report are those of the Grantee and not necessarily those of the California Integrated Waste Management Board, its employees, or the State of California. The State makes no warranty, express or implied, and assumes no liability for the information contained in the succeeding text."

- 3. Description of activities that were undertaken, continued and completed during the reporting period. Activities must be arranged by the categories shown in your approved Work Plan.
- 4. Measured Evaluation.
  - Non-facility construction and/or expansion grants: Results must be submitted on Attachment 1 Project Evaluation Data form found at <a href="http://www.ciwmb.ca.gov/HHW/forms">http://www.ciwmb.ca.gov/HHW/forms</a>. Grantees must download this form for use with the Final Report, as it is embedded with Excel calculation formulas
  - Facility construction and/or expansion grants: Result must be submitted on **Attachment 2 Facility Construction/Expansion Evaluation Data** form found at <a href="http://www.ciwmb.ca.gov/HHW/forms">http://www.ciwmb.ca.gov/HHW/forms</a>. Grantees must download this form for use with the Final Report, as it is embedded with Excel calculation formulas.

Grantees who undertake projects involving both of the above categories must submit both the completed Project Evaluation Data form and the completed Facility Construction/Expansion Data form.

5. Evaluation of project outcome during the grant term.

#### **Answer all of the following questions:**

- a) Did the amount of HHW collected each year during the grant term increase as compared to the year **prior to** the grant term? If so, by what percent? If not, why not?
- b) Did you model your project after that of another grantee? If so, what changes did you make to adapt the model to your jurisdiction?
- c) What aspects of the project worked well and why?

Final Progress Report Due: April 15, 2011 (cont.)

- d) What aspects of the project did not work well and why?
- e) What aspects of the project will be continued beyond the grant term?
- f) What would you do differently if you had to redesign the project? For more on evaluation, see www.ciwmb.ca.gov/UsedOil/Grants/Resources/#Program

### 6. Samples of Premiums and Printed Material

- a) A digital image of each premium item in a commonly accepted format, and all final printed publicity and education materials. The photographs of the premiums must show compliance with procedures (i.e. oil logo, "funded by grant from" phrase, "zero waste" phrase, etc. See "Requirements for Publicity and Education Items" section for guidance.) More than one digital image may be submitted if needed to capture all required components or to accurately illustrate the item. *If compliance with procedures cannot be clearly captured in a photographic image, then a copy or sample of the premium item must be submitted.*
- b) A CD-rom that includes camera-ready graphic art file(s) used to create **each item** developed during the Grant Term.
- c) Two photographs, from different angles, for large items such as equipment or structures.
- d) A photograph of each event attended or conducted (if not previously submitted)

### 7. Samples of final Video and Radio Ads:

A final copy of each video or radio ad (if not previously submitted) in the appropriate media format (VHS or DVD format for videos and cassette tape or compact disc for radio ads)

- 8. Evidence of any work product identified in the scope of work, photographs and descriptions of equipment, structures, events, etc. that were produced, purchased or conducted (unless previously submitted)
- 9. Payment Request, required documentation and an Expenditure Itemization Summary (EIS) can be submitted if reimbursement is desired. Please refer to the section labeled "Payment Request" for more details.

A completed and signed **Recycled-Content Certification Form** (CIWMB 74G) for each item purchased with grant funds. See <a href="https://www.ciwmb.ca.gov/HHW/Forms">www.ciwmb.ca.gov/HHW/Forms</a> for the CIWMB 74G Form.

10. Grant Self Assessment checklist form (See "Prior to Commencing Work") The CIWMB Grant Manager shall authorize payment upon approval of a complete and accurate Grant Payment Request package and, where applicable, all required reports. A payment request may be submitted more frequently, either on a monthly or quarterly basis as long as a description/report of activities completed during that time period is included.

# Payment Request and Fiscal Reporting

### Required documents and Format for Payment Request

A complete payment request package must include the following items:

- 1. **Grant Payment Request Form** (CIWMB 87) This form must be signed by the individual authorized by the Resolution. Please type or print the individual's name and title below the signature. All forms may be downloaded from the California Integrated Waste Management Board's (CIWMB) website at <a href="http://www.ciwmb.ca.gov/HHW/Forms/">http://www.ciwmb.ca.gov/HHW/Forms/</a> or contact the CIWMB Grant Manager.
- 2. **Expenditure Itemization Summary (EIS)** (CIWMB 667) All expenditures must be itemized and arranged by the reporting and expenditure categories as contained in the Grantee's approved Budget and Work Plan.

Each EIS must be accompanied by supporting documentation for each line item expense. The supporting documentation should be an invoice, receipt, or a purchase order with proof of payment (e.g., cancelled check, bank statement, accounting report) or other proof of payment documentation. The Grantee should retain the original documents.

The EIS must include the following certification:

"I certify under penalty of perjury, under the laws of the State of California, that the above information is correct and that all funds received have been expended in accordance with the Grant Agreement."

The certification must be dated and signed by the person authorized in the Grantee's Resolution. An EIS received without the signed certification will not be approved.

- 3. **Supporting Documentation** For audit purposes, documentation for all expenditures claimed on the Grant Payment Request should be retained for a minimum of three (3) years after the closeout of the grant term (see Audit/Records Access in the Terms and Conditions, Exhibit A). Types of acceptable documentation include, but are not limited to:
  - a) **Invoices.** Invoices must include the vendor's name, vendor's telephone number, address, description of goods or services purchased, amount due, and date. If there is more than one invoice from a vendor, list them separately on the EIS and include invoice numbers. The claimed expenses are highlighted and each applicable task number is indicated on each invoice.
  - b) **Receipts.** Receipts should include the same information as invoices (see above).
  - c) **Purchase orders with proof of payment.** Purchase orders should include the same information as invoices and receipts, and must be accompanied by proof of payment (e.g., copies of cancelled checks).

# Payment Request and Fiscal Reporting (cont.)

d) **Personnel Expenditure Summary Form (CIWMB 165 or Grantee's version).** Document personnel expenditures based on actual time spent on grant activities and actual amounts paid to personnel (these forms are not required if you have an alternate time reporting method pre-approved by your CIWMB Grant Manager). This form may be found at the CIWMB website at: <a href="http://www.ciwmb.ca.gov/Grants/Forms/CIWMB165.doc">http://www.ciwmb.ca.gov/Grants/Forms/CIWMB165.doc</a>

- e) **Travel Expense Form (CIWMB 246 or Grantee's version).** Document costs related to travel and include supporting documentation. This form may be found at the CIWMB website at: <a href="http://www.ciwmb.ca.gov/Grants/Forms/CIWMB264.xls">http://www.ciwmb.ca.gov/Grants/Forms/CIWMB264.xls</a>
- f) A completed Recycled-Content Certification Form (CIWMB 74G). This form must be completed even if purchased materials and/or goods do not have recycled content. This form may be found at: <a href="http://www.ciwmb.ca.gov/HHW/Forms/">http://www.ciwmb.ca.gov/HHW/Forms/</a>.

#### **Ten Percent Withhold**

Ten percent (10%) will be withheld from each Grant Payment Request and paid at the end of the grant term when all reports and conditions stipulated in the Grant Agreement have been satisfactorily completed

### **Services Rendered**

Goods and services must be paid for and received within the period from the Notice to Proceed and before the end of the grant term (Notice to Proceed – April 15, 2011), considered the Grant Performance Period. Proof of delivery is required.

### Audit Considerations

The Grantee agrees to maintain records and supporting documentation pertaining to the performance of this grant subject to possible audit for a minimum of three (3) years after final payment date or grant term end date, whichever is later. A longer period of record retention may be stipulated in order to complete any action and/or resolution of all issues which may arise as a result of any litigation, dispute, or audit, whichever is later.

Examples of audit documentation include, but are not limited to, expenditure ledger, payroll register entries, time sheets, personnel expenditure summary form, travel expense log, paid warrants, contracts and change orders, samples of items and materials developed with grant funds, invoices and/or cancelled checks. Please refer to the Terms and Conditions (Exhibit A) for more information.